

Kimberlee A. Colbo
HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC
3900 C Street, Suite 1001
Anchorage, Alaska 99503
Telephone: (907) 274-7522
Facsimile: (907) 263-8320
Email: kcolbo@hgllawfirm.net

Attorneys for Defendants State Farm Mutual
Automobile Insurance Company and David Fletcher

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

MICHAEL D. HOBSON, TERRY
QUANTRILLE and JACQUELINE
QUANTRILLE,

Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, DAVID
FLETCHER and JOHN DOE,

Defendants.

Case No. _____

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant State Farm Mutual Automobile Insurance Company respectfully shows:

1. That on the 28th day of April, 2016, an action was commenced in the Superior Court for the State of Alaska at Anchorage, entitled Michael Hobson, et al. v. State Farm Mutual Insurance Company and David Fletcher, Case No. 3AN-16-06264CI. Plaintiffs' complaint alleges that the amount in controversy is in excess of \$100,000. Therefore, the amount in controversy is greater than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendant State Farm Mutual Automobile Insurance Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on State Farm, via service on the Alaska Division of Insurance, on May 3, 2016. David Fletcher has not yet been served.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiffs were residents of Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant State Farm Mutual Automobile Insurance Company was, and is, a mutual insurance company organized under the laws of the State of Illinois, with its principal place of business in Bloomington, Illinois.

6. At the time this action was commenced, defendant David Fletcher was and is a resident of the State of Washington. David Fletcher has consented to the removal of this matter to the U.S. District Court for the District of Alaska.

7. The citizenship of the “John Doe” defendant is disregarded in determining diversity jurisdiction for the purposes of removal. 28 U.S.C. § 1441(b)(1).

8. Defendant State Farm Mutual Automobile Insurance Company will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant State Farm Mutual Automobile Insurance Company gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 25th day of May, 2016.

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC,
Attorneys for Defendant State Farm
Mutual Automobile Insurance Company

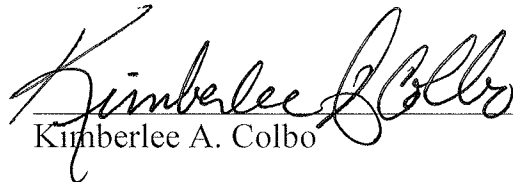
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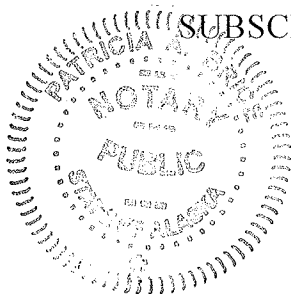
By: s/Kimberlee A. Colbo
Kimberlee A. Colbo
ABA No. 9211072

VERIFICATION

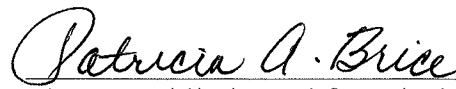
STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is the attorney for State Farm Mutual Automobile Insurance Company, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of State Farm Mutual Automobile Insurance Company.


Kimberlee A. Colbo



SUBSCRIBED AND SWORN TO before me this 25th day of May, 2016.


Notary Public in and for Alaska
My commission expires: 6-11-2019

I hereby certify that a true and correct copy
of the foregoing was served via mail
on the 25th day of May, 2016 on:

Cris Rogers
Rogers & Wirschem LLC
2600 Denali Street, Suite 711-B
Anchorage, AK 99503

Kenneth A. Norsworthy
711 H Street, Suite 410
Anchorage, AK 99501

